

ACTIVITY LOGS
FOR CASE ID VID07, PIC= ROBERT W. DOGGETT

File/ID/Type	Code	Date	Time	Staff	Hours
[CASE ID VID07: Voter Identification]					
VID07 85B-IND-Electio	[COMM] Community Outreach	09/03/2013	16:03 - 20:03	[A1008] Robert W. Doggett	nc 4.0
	Visited community centers in Edna. Explained project to Victoria and Corpus offices.				
VID07 85B-IND-Electio	[TV] Travel	09/03/2013	20:04 - 00:04	[A1008] Robert W. Doggett	4.0
	From Austin to Edna, then Victoria office, then Corpus office (Pueblo).				
VID07 85B-IND-Electio	[TV] Travel	09/04/2013	16:12 - 00:12	[A1008] Robert W. Doggett	8.0
	Traveled from Corpus Office to Rockport Community Center, to Sinton office, to Beeville office, then Refugio Community Center, then Austin.				
VID07 85B-IND-Electio	[COMM] Community Outreach	09/04/2013	00:13 - 02:13	[A1008] Robert W. Doggett	2.0
	Visits to Senior Centers in Rockport and Refugio				
VID07 85B-IND-Electio	[T] Telephone call to...	09/23/2013	09:03 - 10:33	[A1008] Robert W. Doggett	nc 1.5
	looking for experts, call with Kevein Jewell, emails to UT Law Clinics (Heather and Kelly)				
VID07 85B-IND-Electio	[R] Research, Legal	09/24/2013	09:04 - 11:04	[A1008] Robert W. Doggett	2.0
	started reviewing cases on issue (e.g., Indiana case by SCOTUS called Crawford)				
VID07 85B-IND-Electio	[F] Facts investigation	10/28/2013	12:14 - 14:14	[A1008] Robert W. Doggett	nc 2.0
	articles on issue, research on 19th Amendment position				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	11/01/2013	12:20 - 13:20	[A1008] Robert W. Doggett	nc 1.0
	on clients for case				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	11/18/2013	17:16 - 18:16	[A1008] Robert W. Doggett	nc 1.0
	attended call with other counsel to all the VID cases				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	11/19/2013	17:17 - 18:17	[A1008] Robert W. Doggett	nc 1.0
	attended call with co-counsel in Ortiz case				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	11/19/2013	18:18 - 18:30	[A1008] Robert W. Doggett	nc 0.2
	to process server. Thinks there will be a problem with summons				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	11/20/2013	10:21 - 10:33	[A1008] Robert W. Doggett	nc 0.2
	obtained and sent revised summons to process server for service				
VID07 85B-IND-Electio	[T] Telephone call to...	11/20/2013	10:34 - 10:40	[A1008] Robert W. Doggett	nc 0.1
	JG. Will redo summons				
VID07 85B-IND-Electio	[C] Conference w/	11/22/2013	10:14 - 12:14	[A1008] Robert W. Doggett	2.0
	possible experts Jewell and Leeland.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	11/22/2013	12:15 - 12:45	[A1008] Robert W. Doggett	0.5
	to county election persons of three counties (Travis, Cameron, Hidalgo) requesting provisional ballot data. Follow ups. Call back from one same day to chat about it.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	12/02/2013	11:23 - 11:35	[A1008] Robert W. Doggett	nc 0.2
	confirmed engagement agreement with expert, Kevin Jewell.				
	Confirmed.				
	--Robert Doggett				
VID07 85B-IND-Electio	[TV] Travel	12/02/2013	11:36 - 14:36	[A1008] Robert W. Doggett	nc 3.0
	From Austin to SA and back to meet with possible expert in case.				
VID07 85B-IND-Electio	[C] Conference w/	12/02/2013	14:37 - 15:37	[A1008] Robert W. Doggett	nc 1.0
	with possible expert (Patricia Jaramillo) in SA office.				
VID07 85B-IND-Electio	[DP] Document - prepare	12/03/2013	16:17 - 16:23	[A1008] Robert W. Doggett	nc 0.1
	Request Form (Trust / Litigation Adv)				
VID07 85B-IND-Electio	[F] Facts investigation	12/04/2013	15:54 - 17:24	[A1008] Robert W. Doggett	1.5
	on provisional ballots. Requested more info from Travis. Discussion with VB on research project.				
VID07 85B-IND-Electio	[DOC] Document - receive/review	01/03/2014	19:41 - 20:11	[A1008] Robert W. Doggett	0.5
	reviewed 12b response by other plaintiffs and KN's memo on ancil juris in prep for call				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	01/03/2014	20:12 - 20:30	[A1008] Robert W. Doggett	nc 0.3
	with JG, MVD and KN on process for responding to 12b, experts, and motion to consolidate				

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VID07 85B-IND-Electio	[TCC] Telephone Conference Call	01/07/2014	15:08 - 16:08	[A1008] Robert W. Doggett	1.0
	Kevin and Marinda to go over basics of the case.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	01/07/2014	16:09 - 17:09	[A1008] Robert W. Doggett	1.0
	with Jose and Marinda and Katy Newell on response and expert plan				
VID07 85B-IND-Electio	[DOC] Document - receive/review	01/10/2014	15:09 - 17:39	[A1008] Robert W. Doggett	2.5
	reviewed draft response. MVD provided other briefs on standing issue so I submitted a new section that starts to answer the question.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	01/13/2014	14:58 - 15:58	[A1008] Robert W. Doggett	1.0
	with Kevin Jewell and MVD to go over plan to obtain info from clients. Kevin will develop interview questions and we will work with the clients to be able to answer them. Kevin plans to answer three questions. 1) How much out of pocket expenses? 2) How much for other expenses? 3) Impact of these costs on our plaintiffs compared to others. May want to look at tax returns.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	01/13/2014	15:59 - 16:05	[A1008] Robert W. Doggett	nc 0.1
	With JG, MVD, KN to go over response due today.				
VID07 85B-IND-Electio	[R] Research, Legal	01/13/2014	16:06 - 16:36	[A1008] Robert W. Doggett	0.5
	looked up cases cited by state in its 12b to distinguish and explain. Email to JG my answers:				
	Coon case cited in motion at 4 relates to a case where there was some crazy stuff going on in a town, shooting, fighting. Coon was hurt. Coon's wife and daughter sued for their own damages (not Coon's). That is where the 5th Cir stated: "Dana and Racheal Coon, like all persons who claim a deprivation of constitutional rights, were required to prove some violation of their personal rights."				
	Associational standing is a different animal.				
	=====				
	The State also drops: "Shaw v. Garrison, 545 F.2d 980 (5th Cir. 1977), rev'd on other grounds sub nom. Robertson v. Wegmann, 436 U.S. 584 (1978).				
	Rizzo is also inapplicable.				
VID07 85B-IND-Electio	[R] Research, Legal	0113/2014	16:37 - 17:07	[A1008] Robert W. Doggett	0.5
	state's motion. EM to JG on it:				
	Texas Motion, top of 3 references Domino's Pizza case.				
	That was a 1981 case (race case). The plaintiff was black. The contract with the defendant was with the plaintiff's business, not him.				
	"Consistent with our prior case law, and as required by the plain text of the statute, we hold that a plaintiff cannot state a claim under § 1981 unless he has (or would have) rights under the existing (or proposed) contract that he wishes "to make and enforce." Section 1981 plaintiffs must identify injuries flowing from a racially motivated breach of their own contractual relationship, not of someone else's."				
	The Plaintiff in our case is an association. Big difference. Edith Jones's opinion makes this clear. And 1981 case law is way different.				
	Moreover, referencing Domino's Pizza, the 5th Cir through out another case brought by an association for violation of 1981 and other statutes, but specifically noted that the association did not manage to				

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VID07 85B-IND-Electio	<p>plead a 1983 case (clearly if it had, it might have stated a cause of action):</p> <p>"Although the Association presumably intended these allegations to be actionable under 42 U.S.C. § 1983 or 42 U.S.C. § 1985, they fall well short of stating viable civil rights claims. Accordingly, we find no error in the district court's decision to dismiss them."</p> <p>Grambling Univ. Nat'l Alumni Ass'n v. Bd. of Supervisors for the La. Sys., 286 Fed. Appx. 864, 870 (5th Cir. La. 2008)</p> <p>=====</p> <p>As Plaintiffs point out, the Fifth Circuit has addressed, and significantly distinguished, the Tenth Circuit's associational standing analysis in <i>Kansas Health Care</i>. See <i>Ass'n of Am. Physicians</i>, 627 F.3d at 552-53 (concluding individual participation not necessary in suit for declaratory and injunctive relief for alleged constitutional violations including medical board's use of anonymous complaints and retaliatory actions against physicians). In so doing, the Fifth Circuit made clear the distinction rested on whether the claims in a particular case required minimal factual development, such as allegations of administrative illegality, or were of a more fact-sensitive nature. <i>Id.</i> at 552. The Fifth Circuit agreed with the Third and Seventh Circuits, holding "as long as resolution of the claims benefits the association's members and the claims can be proven by evidence from representative injured members, without a fact-intensive-individual inquiry, the participation of those individual members will not thwart associational standing." <i>Id.</i></p> <p>In this case, Plaintiffs are not contending each individual pharmacy [**34] is entitled to a specific determination of its appropriate reimbursement rate. Rather, Plaintiffs are alleging claims based on lack of administrative oversight and violations of various statutes. Janek has not established Plaintiffs' claims require the type of individualized evidentiary consideration as those at issue in the <i>Kansas Health Care</i> case. n12 Accordingly, TrueCare does not lack standing to assert claims on behalf of its members.</p> <p><i>Pharm. Buying Assoc., Inc. v. Sebelius</i>, 906 F. Supp. 2d 604, 618 (W.D. Tex. 2012)</p>				
VID07 85B-IND-Electio	[R] Research, Legal	01/13/2014	17:08 - 18:08	[A1008] Robert W. Doggett	1.0
	<p>on best case to give court on 12b standing issue re 1983:</p> <p>What I sent to Marinda on Friday was just draft, but she said she put it in the response and sent it back to you. Anyway, if you would like, I can clean it up.</p> <p>For example, on the subsection on orgs using 1983 I found a recent Edith Jones quote from a 1983 case that should put that issue to rest:</p> <p>"There is no question that an association may have standing in its own right to seek judicial relief from injury to itself and to vindicate whatever rights and immunities the association itself may enjoy", but "[e]ven in the absence of injury to itself, an association may have standing solely as the representative of its members." <i>Warth v. Seldin</i>, 422 U.S. 490, 511, 95 S. Ct. 2197, 2211, 45 L. Ed. 2d 343 (1975). AAPS's standing here depends on its ability to sue for redress of its members' grievances. Thus,[A]n association has standing to bring suit on behalf of its members when: (a) its members would otherwise have standing to sue in their own right; (b) the interests it seeks to protect are germane to the organization's purpose; and (c) neither the claim asserted nor the relief requested requires the participation of individual members in the lawsuit. See <i>Hunt v. Wash. St. Apple Adver. Comm'n</i>, 432 U.S. 333, 343, 97 S. Ct. 2434, 2441, 53 L. Ed. 2d 383 (1977). The first two components of <i>Hunt</i> address [**7] constitutional requirements, while the third prong is solely prudential. See <i>United Food & Commercial Workers Union Local 751 v. Brown Grp., Inc.</i>, 517 U.S. 544, 555, 116 S. Ct. 1529, 1535, 134 L. Ed. 2d</p>				

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VID07 85B-IND-Electio	758 (1996). Beyond question, AAPS satisfies the first and second Hunt prongs. n2 As to [*551] the third prong, the Board argued that because AAPS's claims require the participation of individual members, it cannot meet that test. The district court agreed that AAPS's allegations about anonymous complaints, conflicts of interest, arbitrary administrative rulings, breaches of privacy, and retaliation cannot be sustained without the extensive participation of individual members and therefore render associational standing improper. We hold otherwise. Ass'n of Am. Physicians & Surgs. v. Tex. Med. Bd., (TMB), 627 F.3d 547, 550-551 (5th Cir. Tex. 2010)				
VID07 85B-IND-Electio	[DOC] Document - receive/review	01/13/2014	18:09 - 19:39	[A1008] Robert W. Doggett	1.5
	sent edits to latest version of response to JG.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	01/14/2014	11:45 - 12:15	[A1008] Robert W. Doggett	nc 0.5
	on interogs and pro hac app by K Newell				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	01/17/2014	11:53 - 12:53	[A1008] Robert W. Doggett	1.0
	with JG and MVD on scheduling, summer plan, experts, and open records issues				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	01/22/2014	11:46 - 12:58	[A1008] Robert W. Doggett	1.2
	with Kevin Jewell to talk about intake questions				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	01/22/2014	12:59 - 13:59	[A1008] Robert W. Doggett	1.0
	with expert Kevin Jewell and MVD on questions				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	01/28/2014	15:01 - 16:01	[A1008] Robert W. Doggett	1.0
	call with Kevin Jewell on progress of client interviews				
VID07 85B-IND-Electio	[TV] Travel	02/11/2014	21:02 - 01:02	[A1008] Robert W. Doggett	nc 4.0
	to CC for status conf with court				
VID07 85B-IND-Electio	[HGP] Hearing Prep (court)	02/11/2014	01:03 - 03:03	[A1008] Robert W. Doggett	nc 2.0
	Prepared for court hearing on status. Meeting with counsel on case.				
VID07 85B-IND-Electio	[HG] Hearing	02/12/2014	21:04 - 23:04	[A1008] Robert W. Doggett	nc 2.0
	status conference				
VID07 85B-IND-Electio	[HGP] Hearing Prep (court)	02/12/2014	23:05 - 00:05	[A1008] Robert W. Doggett	1.0
	Post hearing meeting with counsel.				
VID07 85B-IND-Electio	[F] Facts investigation	02/12/2014	00:06 - 01:06	[A1008] Robert W. Doggett	1.0
	Looked to make contact with client.				
VID07 85B-IND-Electio	[TV] Travel	02/12/2014	01:07 - 05:07	[A1008] Robert W. Doggett	nc 4.0
	from CC back to Austin				
VID07 85B-IND-Electio	[HG] Hearing	02/14/2014	21:15 - 22:15	[A1008] Robert W. Doggett	nc 1.0
	Appeared by telephone to listen to proceedings.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	02/24/2014	11:52 - 13:22	[A1008] Robert W. Doggett	1.5
	regarding docs needed for expert, call				
VID07 85B-IND-Electio	[EMR] E-Mail, receive/review/manage	02/27/2014	11:52 - 12:52	[A1008] Robert W. Doggett	nc 1.0
	on issues related to legislative privilege				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	03/03/2014	21:02 - 21:08	[A1008] Robert W. Doggett	nc 0.1
	between counsel regarding case				
VID07 85B-IND-Electio	[DOC] Document - receive/review	03/04/2014	14:53 - 15:17	[A1008] Robert W. Doggett	nc 0.4
	reviewed scheduling order changes being considered by P groups and explanations				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	03/21/2014	15:21 - 16:21	[A1008] Robert W. Doggett	1.0
	with Marinda, JG on plan for case, answering discovery questions, initial disclosures, depo planning, hearing coming up next week, expert issues				

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VID07 85B-IND-Electio	[EM] Email, Draft / Send	03/24/2014	10:03 - 10:15	[A1008] Robert W. Doggett	nc 0.2
	on possible volunteer counsel wanting to help us with case				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	03/24/2014	10:16 - 10:40	[A1008] Robert W. Doggett	nc 0.4
	regarding plan for hearing, new law firm offering assistance				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	03/25/2014	10:15 - 10:27	[A1008] Robert W. Doggett	0.2
	on depositions, 30(b)(6). How are we going to cover them all.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	03/25/2014	10:28 - 10:58	[A1008] Robert W. Doggett	0.5
	on RFPDs from state. Reviewed them.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	03/26/2014	10:16 - 10:22	[A1008] Robert W. Doggett	0.1
	on initial disclosures.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	03/26/2014	10:23 - 10:47	[A1008] Robert W. Doggett	nc 0.4
	modifications to themes for document production search terms (to add women issue)				
VID07 85B-IND-Electio	[DOC] Document - receive/review	03/31/2014	11:09 - 12:21	[A1008] Robert W. Doggett	1.2
	review of RFPD to our plaintiffs				
VID07 85B-IND-Electio	[TCC] Telephone Conference Cal	04/01/2014	08:37 - 10:07	[A1008] Robert W. Doggett	nc 1.5
	with judge on legislative privilege issues				
VID07 85B-IND-Electio	[T] Telephone call to...	04/01/2014	10:08 - 10:38	[A1008] Robert W. Doggett	0.5
	Marinda on issues with clients. Planning trip to Kenedy to visit client. Status of Ortiz, the client in Berclair, written discovery.				
VID07 85B-IND-Electio	[TV] Travel	04/03/2014	08:20 - 12:20	[A1008] Robert W. Doggett	4.0
	to Kenedy from Austin to visit with Lionel Estrada (client and plaintiff in case). It is 2 hours each way.				
VID07 85B-IND-Electio	[F] Facts investigation	04/03/2014	12:21 - 14:21	[A1008] Robert W. Doggett	2.0
	interviewed Lionel Estrada in Kenedy				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	04/04/2014	11:18 - 12:18	[A1008] Robert W. Doggett	1.0
	on issues after reviewing numerous emails:				
	1. Should we push de bene esse depositions of our clients? If I knew we could get our clients to trial, and they say it right, this would be powerful testimony. Those are two big ifs. Maybe we depose de bene esse the ones we know will be very hard to find and get to the courthouse.				
	If we want this, I think we need to be talking about it with everyone and get some agreements or bring it up at the next status conference with the judge.				
VID07 85B-IND-Electio	[DP] Document - prepare	04/04/2014	12:19 - 13:37	[A1008] Robert W. Doggett	1.3
	reviewing Estrada's declaration and for other facts from interview and docs after meeting with him in Kenedy.				
	Docs loaded into Dropbox.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	04/07/2014	08:22 - 09:22	[A1008] Robert W. Doggett	1.0
	with Jose and Marinda on how to handle production deadline, initial disclosures, trial depositions, adding an item to DPS depo				
VID07 85B-IND-Electio	[DP] Document - prepare	04/08/2014	08:18 - 09:18	[A1008] Robert W. Doggett	1.0
	Review and edit declaration of Lionel Estrada				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	04/08/2014	09:19 - 09:55	[A1008] Robert W. Doggett	nc 0.6
	with judge and parties re scheduling order				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	04/08/2014	09:56 - 10:56	[A1008] Robert W. Doggett	1.0
	with Kevin, Marinda, Jose, Katy on plan for depositions, more facts from our clients				

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File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[EM] Email, Draft / Send	04/08/2014	10:57 - 11:21	[A1008] Robert W. Doggett	0.4
	to Plaintiff groups re request to add item to DPS depo. set issue for Thursday con calls.				
VID07 85B-IND-Electio	[TRAI] Training - attend	04/09/2014	11:20 - 12:20	[A1008] Robert W. Doggett	nc 1.0
	training on how to use the doc retrieval system (Crivella West)				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	04/10/2014	14:05 - 15:35	[A1008] Robert W. Doggett	nc 1.5
	regarding open record requests for Cameron, and others. Got data, sent to others on team				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	04/10/2014	15:36 - 16:00	[A1008] Robert W. Doggett	nc 0.4
	with Jose and Marinda on open records				
VID07 85B-IND-Electio	[F] Facts investigation	04/10/2014	16:01 - 17:01	[A1008] Robert W. Doggett	nc 1.0
	research on naming conventions				
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	04/11/2014	11:22 - 12:52	[A1008] Robert W. Doggett	1.5
	Drafted discovery documents: call to go over objections to discovery requests from state (1st set)				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	04/15/2014	11:02 - 11:14	[A1008] Robert W. Doggett	0.2
	re Leonard Taylor's birth cert. Also the Crivella West training issue.				
VID07 85B-IND-Electio	[DP] Document - prepare	04/15/2014	11:15 - 12:45	[A1008] Robert W. Doggett	nc 1.5
	Lionel Estrada's declaration.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	04/15/2014	12:46 - 12:58	[A1008] Robert W. Doggett	0.2
	deposition schedule				
VID07 85B-IND-Electio	[ADM] Administrative / Office Matters	04/15/2014	12:59 - 13:47	[A1008] Robert W. Doggett	nc 0.8
	created master calendar that all could use on the web to be updated in real time				
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	04/15/2014	13:48 - 14:18	[A1008] Robert W. Doggett	0.5
	got with AB to start working on obj to RFPD				
VID07 85B-IND-Electio	[ADM] Administrative / Office Matters	04/16/2014	09:20 - 10:50	[A1008] Robert W. Doggett	nc 1.5
	went through deadlines in case, and updated calendar, set up calendar to notify if changes				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	04/16/2014	10:51 - 11:21	[A1008] Robert W. Doggett	0.5
	regarding organizational RFPD from state and coordinating with other parties. Also, how we actually produce docs -- using specially designed transfers, Bates Stamping, etc.				
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	04/16/2014	11:22 - 12:04	[A1008] Robert W. Doggett	0.7
	reviewed RFPD to state by Veasey-LULAC. I think we should consider changes to the scope of the request. EM to our team				
VID07 85B-IND-Electio	[T] Telephone call to...	04/17/2014	14:08 - 14:38	[A1008] Robert W. Doggett	0.5
	Marinda on what we need to ask state -- moving deadlines, complying with electronic discovery requirements, and locating all discovery sent to state so we can see if holes				
VID07 85B-IND-Electio	[DOC] Document - receive/review	04/21/2014	11:26 - 11:56	[A1008] Robert W. Doggett	0.5
	3rd request for production from state. Reviewed, and emailed co-counsel				
VID07 85B-IND-Electio	[DNP] Deposition - Prep	04/22/2014	08:05 - 09:35	[A1008] Robert W. Doggett	1.5
	for SOS Ingram				
VID07 85B-IND-Electio	[DEP] Deposition - Take	04/23/2014	08:05 - 13:05	[A1008] Robert W. Doggett	nc 5.0
	Attended deposition of SOS e dir., Ingram				
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	04/28/2014	08:16 - 09:04	[A1008] Robert W. Doggett	0.8
	Located and transmitted docs in my email responsive to the state's second request for production to the individual plaintiffs (sent to Marinda for compiling with other responsive docs).				
VID07 85B-IND-Electio	[T] Telephone call to...	04/28/2014	09:05 - 09:23	[A1008] Robert W. Doggett	0.3
	Marinda and I went over plan for week with discovery due.				
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	04/29/2014	15:40 - 19:40	[A1008] Robert W. Doggett	4.0
	Drafted discovery documents: responses and objections to state's first requests for production to individuals.				

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File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	04/29/2014	19:41 - 21:41	[A1008] Robert W. Doggett	2.0
	Drafted discovery documents: [DESCRIBE] responses and objections to state's interrogatory and 2nd set of request for production to individuals.				
VID07 85B-IND-Electio	[DEP] Deposition - Take	04/30/2014	09:09 - 16:39	[A1008] Robert W. Doggett	7.5
	Attend and propounded questions to DPS rep Joe Peters. In Austin from 9-5. 30 min lunch.				
VID07 85B-IND-Electio	[DOC] Document - receive/review	04/30/2014	16:40 - 17:10	[A1008] Robert W. Doggett	0.5
	got copy of opinion issued by judge denying restitution				
VID07 85B-IND-Electio	[T] Telephone call to...	05/01/2014	09:43 - 10:01	[A1008] Robert W. Doggett	0.3
	Marinda on plan for finalizing responses to written discovery.				
VID07 85B-IND-Electio	[T] Telephone call to...	05/01/2014	10:02 - 10:08	[A1008] Robert W. Doggett	nc 0.1
	DGH on his thoughts on Leland and experts in light of Wis decision.				
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	05/01/2014	10:09 - 13:09	[A1008] Robert W. Doggett	3.0
	Drafted discovery documents: drafted responses to request for production (1st set)				
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	05/01/2014	13:10 - 14:28	[A1008] Robert W. Doggett	1.3
	Drafted discovery documents: response to request for prod (2nd set) and one interrogatory				
VID07 85B-IND-Electio	[HG] Hearing	05/01/2014	14:29 - 15:23	[A1008] Robert W. Doggett	nc 0.9
	Hearing on motion to quash subpoenas sent to legislators				
VID07 85B-IND-Electio	[T] Telephone call to...	05/01/2014	15:24 - 15:30	[A1008] Robert W. Doggett	0.1
	Dan Freeman DOJ on experts needed for trial and comparison to Wis case				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/02/2014	16:05 - 16:17	[A1008] Robert W. Doggett	nc 0.2
	concerning experts being retained by all parties (except DOJ)				
VID07 85B-IND-Electio	[DP] Document - prepare	05/02/2014	16:18 - 16:36	[A1008] Robert W. Doggett	nc 0.3
	edits to motion and order to withdraw Peter M, with email to opposing to confirm no objection.				
VID07 85B-IND-Electio	[T] Telephone call to...	05/02/2014	16:37 - 16:55	[A1008] Robert W. Doggett	nc 0.3
	Leland about expert testimony he might be interested in doing				
VID07 85B-IND-Electio	[DOC] Document - receive/review	05/05/2014	18:30 - 19:00	[A1008] Robert W. Doggett	nc 0.5
	review of 5th Cir case by True the Vote to stay or accelerate appeal. I am opposed to both, but they did not ask or officially notice the Ortiz plaintiffs through me (maybe Jose).				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/06/2014	18:31 - 18:55	[A1008] Robert W. Doggett	0.4
	and discussion with DOJ concerning their docs they got from the counties. We will get a disk with them by FedEx.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/06/2014	18:56 - 19:02	[A1008] Robert W. Doggett	0.1
	to Kevin Jewell re trial schedule so he can mark out days.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/06/2014	19:03 - 19:39	[A1008] Robert W. Doggett	0.6
	with Kevin Jewell				
VID07 85B-IND-Electio	[T] Telephone call to...	05/07/2014	18:35 - 19:05	[A1008] Robert W. Doggett	nc 0.5
	Marinda to discuss where we are with depositions of legislators				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/07/2014	19:06 - 19:24	[A1008] Robert W. Doggett	nc 0.3
	to Marinda after a phone call with DOJ: So Bruce with DOJ called me about the docs being produced by the counties (I called them because Jessica said she was very interested in these docs). He says Jose has been getting FedExes of them with CDs. I talked to him about getting some BBQ on his next visit to Austin,,, and he is going to send me one CD that might be particularly helpful, but not all of them I don't think. Maybe Katy could help sort through Jose's mail				
	We might also want to tell all parties to send stuff to you directly and avoid this problem going forward.				

ACTIVITY LOGS
FOR CASE ID VID07, PIC= ROBERT W. DOGGETT

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[DOC] Document - receive/review	05/07/2014	19:25 - 19:49	[A1008] Robert W. Doggett	0.4
	reviewed docs we are producing to Texas in response to discovery				
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	05/07/2014	19:50 - 19:56	[A1008] Robert W. Doggett	nc 0.1
	documents that appear responsive, no objection, should produce. MVD requested DGH opinion.				
VID07 85B-IND-Electio	[DOC] Document - receive/review	05/07/2014	19:57 - 20:09	[A1008] Robert W. Doggett	nc 0.2
	subpoenas for all the legislators issued				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/07/2014	20:10 - 20:58	[A1008] Robert W. Doggett	nc 0.8
	with Jessica expert				
VID07 85B-IND-Electio	[DOC] Document - receive/review	05/08/2014	18:43 - 19:13	[A1008] Robert W. Doggett	nc 0.5
	got draft of TLSC's pet for mandamus				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/08/2014	19:14 - 20:14	[A1008] Robert W. Doggett	nc 1.0
	with counsels for Plaintiffs				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/09/2014	18:43 - 19:13	[A1008] Robert W. Doggett	0.5
	email and calls to discuss what TRLA would do				
VID07 85B-IND-Electio	[DEP] Deposition - Take	05/09/2014	19:14 - 01:14	[A1008] Robert W. Doggett	nc 6.0
	of DHHSC in Price Daniel Building with Dan Freeman. John Scott defended.				
VID07 85B-IND-Electio	[T] Telephone call to...	05/09/2014	01:15 - 01:45	[A1008] Robert W. Doggett	nc 0.5
	Leland to retain him and explain our plan.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	05/09/2014	01:46 - 02:10	[A1008] Robert W. Doggett	nc 0.4
	to MVD, DGH on plan for Leland and update on expert analysis by DOJ's people				
VID07 85B-IND-Electio	[C] Conference w/	05/09/2014	02:11 - 02:35	[A1008] Robert W. Doggett	0.4
	Dan Freeman of DOJ after depo to discuss concerns about expert witness data analysis				
VID07 85B-IND-Electio	[HG] Hearing	05/12/2014	18:49 - 19:49	[A1008] Robert W. Doggett	nc 1.0
	Telephone status hearing.				
VID07 85B-IND-Electio	[DOC] Document - receive/review	05/12/2014	19:50 - 20:14	[A1008] Robert W. Doggett	nc 0.4
	letter from state conferring before motion to compel on production discovery				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/12/2014	20:15 - 20:45	[A1008] Robert W. Doggett	nc 0.5
	with DOJ, Leland, MVD on expert data analysis				
VID07 85B-IND-Electio	[HG] Hearing	05/15/2014	09:11 - 10:17	[A1008] Robert W. Doggett	nc 1.1
	Hearing on external campaign materials (quahsed), judicial notice of DOJ's report denied (w/o prejudice), length and process of trial -- judge is fine with two weeks, or more. Hearings will be set every 10 days going forward. Judge not moving trial.				
VID07 85B-IND-Electio	[T] Telephone call to...	05/19/2014	12:15 - 12:39	[A1008] Robert W. Doggett	0.4
	with DOJ on county data. Sending me more disks by FedEx				
VID07 85B-IND-Electio	[DEP] Deposition - Take	05/20/2014	12:19 - 15:19	[A1008] Robert W. Doggett	nc 3.0
	Katherine Cesinger at Dechert				
VID07 85B-IND-Electio	[T] Telephone call to...	05/27/2014	08:10 - 08:28	[A1008] Robert W. Doggett	nc 0.3
	Mainrda. Plan for production supplement, depo prep.				
VID07 85B-IND-Electio	[HG] Hearing	05/28/2014	11:43 - 12:13	[A1008] Robert W. Doggett	nc 0.5
	Hearing on - status hearing on common interest doc (wants more briefing), depositions, release of data				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/28/2014	12:14 - 12:44	[A1008] Robert W. Doggett	nc 0.5
	with state on data release. State objecting to giving us what DOJ got.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/28/2014	12:45 - 13:45	[A1008] Robert W. Doggett	1.0
	among P groups on common interest, list of IDs, SB 14 definition, membership info from org clients				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/28/2014	13:46 - 14:46	[A1008] Robert W. Doggett	nc 1.0
	prehearing call with Plaintiff groups				

ACTIVITY LOGS
FOR CASE ID VID07, PIC= ROBERT W. DOGGETT

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[HG] Hearing	05/28/2014	14:47 - 14:53	[A1008] Robert W. Doggett	nc 0.1
	Hearing on data issue				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/29/2014	11:48 - 12:48	[A1008] Robert W. Doggett	nc 1.0
	with Plaintiff groups - common interest briefing, motion to quash legis depositions, membership issues, meeting regarding experts				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/29/2014	12:49 - 13:19	[A1008] Robert W. Doggett	nc 0.5
	with Plaintiff groups and DOJ regarding data, experts, common interest				
VID07 85B-IND-Electio	TCC] Telephone Conference Call	05/29/2014	13:20 - 14:20	[A1008] Robert W. Doggett	nc 1.0
	with Plaintiff Groups to go over:				
	> 1. Common interest briefing > > 2. Legislator deposition briefing/motions to transfer > > 3. Texas's subpoenaing of legislators' documents > > 4. Texas's document requests/agreements from meet and confer > > A. Membership lists -- See suggested draft stipulation below > > B. Contention discovery > > 5. Expert meeting with DOJ > > 6. Depositions of friendly legislators > > 7. Request for Admission responses 8. Status of affected person identification				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/29/2014	14:21 - 15:21	[A1008] Robert W. Doggett	nc 1.0
	Call with DOJ and Plaintiff Groups:				
	1. Common interest 2. Databases 3. Experts, meeting to discuss 4. RFA call needed after hearing				
VID07 85B-IND-Electio	[R] Research, Legal	05/29/2014	15:22 - 16:34	[A1008] Robert W. Doggett	1.2
	on privilege questions that may be asked at depositions of our clients today, e.g., reason for getting an attorney, driving with expired license				
VID07 85B-IND-Electio	[HG] Hearing	05/30/2014	11:50 - 13:50	[A1008] Robert W. Doggett	nc 2.0
	Hearing on motion to quash subpoenas of legislations. Heard in person in Judge Sparks court. Judge transferred motions to Judge Ramos.				
VID07 85B-IND-Electio	[F] Facts investigation	06/02/2014	14:02 - 15:32	[A1008] Robert W. Doggett	nc 1.5
	got data from DOJ. Created receipt and disclosure for Leland, along with declarations and supporting material so he could analyze the data. Met him and gave him data.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	06/02/2014	15:33 - 15:51	[A1008] Robert W. Doggett	0.3
	I think this is agreeable. Call me to chat if you want.				
VID07 85B-IND-Electio	[DISC] Discovery (drafting docs)	06/02/2014	15:52 - 16:34	[A1008] Robert W. Doggett	0.7
	Confer on issues with state:				
	Sorry this response is a couple hours later than you requested.				
	1. Our clients have produced and will continue to produce SB 14 supporting documents and birth certificate documents requested by the state in the discovery previously propounded and thus any alternative procedure is inapplicable. We will make every effort to produce them to the extent we have not already, two days prior to the deposition.				

ACTIVITY LOGS
FOR CASE ID VID07, PIC= ROBERT W. DOGGETT

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	<p>2. Regarding the SB 14 definition and the date issues, the our clients do not have any such documents, but will supplement if any are discovered.</p> <p>3. We are ok with the membership compromise being worked out with y'all and Ezra, and another issue you are working on with Chad. Please advise if this is still a problem.</p> <p>4. Please be advised that Belinda Ortiz has now obtained id that complies with SB 14. Also, that Leonard Taylor and Eulalio Mendez do not have certified copies of their birth certificates.</p> <p>Is there anything else you need from us?</p> <p>Robert Doggett</p> <p>On 5/29/2014 7:03 PM, Roscetti, Jennifer wrote: > Dear Counsel, > > I am emailing on behalf of Ms. Wolf to follow up regarding outstanding issues from our past teleconferences concerning Plaintiffs' responses to Defendants' Requests for Production. > > The first outstanding issue relates to Defendants providing a list of documents that individual Plaintiffs will then review to determine whether they have possession, custody, or control of the documents rather than having to produce all the requested materials. This is the category of documents Ms. Wolf refers to as "supporting documents" for obtaining an EIC, Driver License, or other form of identification. Defendants are actively compiling this list and plan to provide it to Plaintiffs on Friday, May 30, 2014 by 2:00 p.m. CST. Please confirm by 2:00 p.m. CST, on Monday, June 2, 2014 whether Plaintiffs approve of the Defendants' list and will agree to comply with this procedure instead of providing documents responsive to Defendants' requests for production. > > The next outstanding issue relates to what Ms. Wolf has previously referred to as "family member documents." Defendants have proposed the following procedure for the individual Plaintiffs who have not, or have been unable to produce their birth certificate. Defendants will provide a list of underlying documents that Plaintiffs' can review and affirm whether or not Plaintiffs have possession, custody, or control of documents relating to immediate family members that would allow those immediate family members to obtain a birth certificate for the Plaintiffs. Defendants will provide this list to Plaintiffs by Friday, May 30 at 2:00 p.m. CST for review. Defendants request confirmation by 2:00 p.m. CST, on Monday, June 2, 2014 whether or not Plaintiffs will approve of Defendants' proposed list and will agree to comply with this procedure rather than providing the documents responsive to Defendants' requests for production. > > Defendants would like to clarify that this procedure does not need to apply to (1) individual Plaintiffs who have not alleged that they lack forms of identification under SB 14 (i.e., politicians and community organizers); (2) individual voters who have alleged to have been disenfranchised who have either (a) produced a birth certificate, or (b) a form of identification which would be permissible for voting under SB 14. As a result, this approach would apply to: Peggy Draper Herman, Ken Gandy, John Mellor-Crummey, Koby Ozias, Gordon Benjamin, Belinda Ortiz, Lionel Estrada, and Margarito Martinez Lara. If any of these individuals are over 75 years of age, they also do not have to comply with this procedure. Defendants request confirmation that this procedure will be complied with (as well as whether any of these individuals are over 75 years of age, and are thus exempt) by 2:00 p.m. CST, on Monday, June 2, 2014. > >The third outstanding issue relates to Plaintiffs' objection to the definition of SB 14 and the date requirements under Defendants' requests. More specifically, Plaintiffs objected to producing any documents prior to January 2012 or that relate to any other previous voter id bill. It is Defendants' understanding that Plaintiffs are still confirming whether or not their clients are withholding documents</p>				

ACTIVITY LOGS
FOR CASE ID VID07, PIC= ROBERT W. DOGGETT

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio					
<p>based on objections to the definition of SB 14 or the date of January 2012. Defendants request that Plaintiffs confirm, in writing, by 2:00 p.m. CST on Monday, June 2, 2014 whether or not documents have been searched for and been produced, or in the alternative, have been searched for and are being withheld.</p> <p>></p> <p>> The next outstanding issue concerns Plaintiffs' objections to providing Defendants membership lists. As an alternative to the Plaintiff organizations producing a complete membership list, Defendants have proposed to Plaintiffs two options. These options include either (1) producing a list of members who Plaintiffs allege have been injured by SB 14; or (2) Plaintiffs providing a stipulation that the organization does not have the ability to respond to the request (without waiving any objections) because it does not maintain a membership record detailing which members possess the acceptable SB 14 identification. It is Defendants' understanding that Mr. Rosenberg is drafting the stipulation language, and that depending on the language the other organizational Plaintiffs will either use the stipulation procedure, or stand on their objections. Defendants request that Mr. Rosenberg provide the draft stipulation by 2:00 p.m. CST, on Monday, June 2, 2014. Defendants also request that the other Plaintiffs provide a definitive answer, in writing, as to whether or not this stipulation procedure will be an acceptable alternative to providing documents responsive to the requests for production by 2:00 p.m. CST, on Monday, June 2, 2014.</p> <p>></p> <p>>The last issue relates to what has collectively been referred to as the "contention requests." Defendants' understanding is that the proposed procedure to handle responses to these contentions requests is to allow Plaintiffs to provide a global document response. More specifically, Plaintiffs would produce the documents that are responsive to the contention requests and rather than identifying each request the documents are responsive to, Plaintiffs would accompany the document production with a statement that Plaintiffs were not withholding documents that were responsive to the contention requests. Furthermore, it is our understanding that Mr. Dunn was working on the language for this statement, and while Mr. Dunn was not available for the May 27, 2014 meet and confer, Mr. Baron would consult with him regarding this issue. Defendants request that Plaintiffs provide a written procedure for handling this matter, including any proposed language regarding their productions, by 2:00 p.m. CST, on Monday, June 2, 2014</p> <p>></p> <p>> Defendants are more than willing to work with the Plaintiffs on all these discovery issues, but unfortunately due to the imminent discovery deadlines we need written responses to ensure the progression of the conference process. If Defendants do not receive responses to these issues by the June 2 deadline, we will have to move forward with Motions to Compel.</p> <p>></p> <p>></p> <p>> Sincerely,</p> <p>></p> <p>>Jennifer M. Roscetti >Assistant Attorney General >Office of the Attorney General >Consumer Protection Division >300 W.15th Street, 9th Floor >Austin, Texas 78701 >512.475.4183 (t) >512.473.8301 (f)</p> <p>></p> <p>>-----Original Message----- > From: Wolf, Lindsey > Sent: Wednesday, May 28, 2014 9:43 AM > To: Robert Doggett (AUS); Ali, Hasan >Cc: Neil Baron; Rosenberg, Ezra; EXT Chad Dunn; EXT Armand Derfner; EXTLuis Vera Jr; EXT</p>					

ACTIVITY LOGS
FOR CASE ID VID07, PIC= ROBERT W. DOGGETT

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	mvandalen; EXT Gerry Hebert; rhaygood@naacpldf.org; EXT Rolando L. Rios; sian@henrichsonlaw.com; EXT Preston E. Henrichson; EXT Scott Brazil; pnoriega@trla.org ; knewell@trla.org; cswarns@naacpldf.org; EXT Deuel Ross; EXT Leah Aden; EXT Natasha Korgaonkar; Conley, Danielle; Shordt, Richard; Paikin, Jonathan; Dunbar, Kelly P.; Sinzduk, Gerard; Lebsack, Sonya L; Eisenberg, Lynn; EXT Emma Simson; anna.baldwin@usdoj.gov; robert.berman@usdoj.gov ; richard.dellheim@usdoj.gov; elizabeth.westfall@usdoj.gov; avner.shapiro@usdoj.gov ; daniel.freeman@usdoj.gov; jennifer.maranzano@usdoj.gov; john.a.smith@usdoj.gov ; meredith.bell-platts@usdoj.gov; bruce.gear@usdoj.gov; Rudd, Amy; Yeary, Michelle; ttrainor@bmplp.com; jnixon@bmplp.com; jenniferl.clark@nyu.edu; EXT Vishal Agraharkar; EXT Wendy Weiser; EXT Myrna Perez; EXT Erandi Zamora; mposner@lawyerscommittee.org; EXT Sonia Gill; EXT Jose Garza; pmcgra w@trla.org; bdonnell@dakpc.com; Scott, John; Clay, Reed; Whitley, David; Roscetti, Jennifer; Keister, Ronny; Deason, Whitney; Hayes, Kevin; Tatum, Stephen; Wilson, Anne; Ried, Lisa; D'Andrea, Arthur > Subject: RE: Veasey v. Perry - Follow-Up Meet-and-Confer from Meet-and-Confer of Thursday, May 22 > > Thanks, counsel. I will assume any other representatives for the non-U.S. Plaintiffs and Plaintiff-Intervenors who would like to participate are also available at 1 P.M. CST, unless I hear otherwise.				
VID07 85B-IND-Electio	[T] Telephone call to...	06/02/2014	16:35 - 16:59	[A1008] Robert W. Doggett	0.4
VID07 85B-IND-Electio	[EM] Email, Draft / Send	06/03/2014	14:12 - 14:24	[A1008] Robert W. Doggett	0.2
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/04/2014	14:05 - 14:17	[A1008] Robert W. Doggett	0.2
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/05/2014	11:33 - 12:15	[A1008] Robert W. Doggett	0.7
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/05/2014	12:16 - 13:16	[A1008] Robert W. Doggett	nc 1.0
VID07 85B-IND-Electio	[HG] Hearing	06/06/2014	11:38 - 12:38	[A1008] Robert W. Doggett	nc 1.0
VID07 85B-IND-Electio	[DNP] Deposition - Prep	06/09/2014	11:44 - 12:14	[A1008] Robert W. Doggett	0.5
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/09/2014	12:15 - 13:03	[A1008] Robert W. Doggett	nc 0.8
VID07 85B-IND-Electio	[EM] Email, Draft / Send	06/09/2014	13:04 - 13:10	[A1008] Robert W. Doggett	nc 0.1
VID07 85B-IND-Electio	[EMR] E-Mail, receive/review/manage	06/09/2014	13:11 - 13:41	[A1008] Robert W. Doggett	nc 0.5
VID07 85B-IND-Electio	[T] Telephone call to...	06/11/2014	12:12 - 12:54	[A1008] Robert W. Doggett	0.7
VID07 85B-IND-Electio	[T] Telephone call to...	06/11/2014	12:55 - 13:43	[A1008] Robert W. Doggett	0.8
VID07 85B-IND-Electio	[EM] Email, Draft / Send	06/12/2014	12:14 - 12:32	[A1008] Robert W. Doggett	0.3
VID07 85B-IND-Electio	[T] Telephone call to...	06/12/2014	12:33 - 12:57	[A1008] Robert W. Doggett	nc 0.4
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/12/2014	12:58 - 15:58	[A1008] Robert W. Doggett	nc 3.0

ACTIVITY LOGS
FOR CASE ID VID07, PIC= ROBERT W. DOGGETT

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[DOC] Document - receive/review	06/16/2014	11:58 - 13:58	[A1008] Robert W. Doggett	2.0
	reviewed and edited LUPE's objections to topics in its deposition. Sent copy to all counsel.				
VID07 85B-IND-Electio	[DOC] Document - receive/review	06/16/2014	13:59 - 14:17	[A1008] Robert W. Doggett	0.3
	reviewed a brief to be filed on behalf of Ps to respond to State's request to obtain federal databases. Signed off.				
VID07 85B-IND-Electio	[T] Telephone call to...	06/16/2014	14:18 - 14:30	[A1008] Robert W. Doggett	0.2
	Kevin on financial inputs he was using for travel and other issues for his report				
VID07 85B-IND-Electio	[T] Telephone call to...	06/16/2014	14:31 - 14:43	[A1008] Robert W. Doggett	nc 0.2
	Wilmer Hale atty rep Plaintiffs to discuss their expert inputs				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	06/17/2014	08:04 - 08:16	[A1008] Robert W. Doggett	nc 0.2
	on depo of written questions for Lara. Will be faster if client can do it at all.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	06/17/2014	08:17 - 08:35	[A1008] Robert W. Doggett	0.3
	regarding plan for depo of Estrada				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	06/18/2014	08:05 - 08:23	[A1008] Robert W. Doggett	nc 0.3
	on judicial notice of docs				
VID07 85B-IND-Electio	[DOC] Document - receive/review	06/18/2014	08:24 - 08:54	[A1008] Robert W. Doggett	nc 0.5
	Jessica's draft report -				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	06/18/2014	08:55 - 09:07	[A1008] Robert W. Doggett	0.2
	on admission of prior depositions (from prior case)				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/19/2014	08:08 - 09:08	[A1008] Robert W. Doggett	nc 1.0
	with Plaintiffs' counsel, went over issues of the week				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/19/2014	09:09 - 09:45	[A1008] Robert W. Doggett	0.6
	with MVD and Kevin on what is left for report, and how to handle assumptions				
VID07 85B-IND-Electio	[T] Telephone call to...	06/20/2014	08:09 - 08:21	[A1008] Robert W. Doggett	0.2
	Kevin on latest with Estrada and plan for his declaration				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/23/2014	08:09 - 08:45	[A1008] Robert W. Doggett	nc 0.6
	went over Leland's report on impact of SB 14 on women				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/23/2014	08:46 - 09:10	[A1008] Robert W. Doggett	nc 0.4
	with attys from Wilmer Hale to discuss what Leland found in his analysis of data				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/23/2014	09:11 - 09:29	[A1008] Robert W. Doggett	0.3
	Jessica on what is going on with provisional ballot analysis				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/23/2014	09:30 - 09:48	[A1008] Robert W. Doggett	0.3
	with state to confer on their motion to compel interrogatory responses				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/24/2014	08:35 - 09:35	[A1008] Robert W. Doggett	1.0
	MVD on docs needed to support discovery, LUPE depo prep, Estrada prep for depo				
VID07 85B-IND-Electio	[DNP] Deposition - Prep	06/24/2014	09:36 - 10:36	[A1008] Robert W. Doggett	1.0
	for Estrada depo				
VID07 85B-IND-Electio	[TV] Travel	06/25/2014	08:43 - 10:31	[A1008] Robert W. Doggett	1.8
	to Kenedy to meet with client (Lionel Estrada) before depo				
VID07 85B-IND-Electio	[DNP] Deposition - Prep	06/25/2014	10:32 - 12:32	[A1008] Robert W. Doggett	2.0
	Prepared for deposition of - met with client in DQ and went over everything				
VID07 85B-IND-Electio	[DEP2] Deposition - Defend	06/26/2014	09:01 - 13:01	[A1008] Robert W. Doggett	4.0
	Lionel Estrada in Kenedy (Best Western)				
VID07 85B-IND-Electio	[DP] Document - prepare	06/26/2014	13:02 - 13:26	[A1008] Robert W. Doggett	0.4
	declaration of Estrada for him to sign				
VID07 85B-IND-Electio	[TV] Travel	06/26/2014	13:27 - 15:27	[A1008] Robert W. Doggett	2.0
	from Kenedy to Austin after depo				

ACTIVITY LOGS
FOR CASE ID VID07, PIC= ROBERT W. DOGGETT

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/26/2014	15:28 - 15:46	[A1008] Robert W. Doggett	0.3
	with MVD on plan, and result of depo				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/27/2014	09:07 - 09:37	[A1008] Robert W. Doggett	0.5
	with Kevin and MVD on expert report				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/27/2014	09:38 - 09:50	[A1008] Robert W. Doggett	0.2
	with Kevin and Lionel Estrada to go over some details for Kevin's report				
VID07 85B-IND-Electio	[DOC] Document - receive/review	06/27/2014	09:51 - 10:03	[A1008] Robert W. Doggett	0.2
	sent declaration of Estrada to Kevin				
VID07 85B-IND-Electio	[DP] Document - prepare	06/27/2014	10:04 - 12:34	[A1008] Robert W. Doggett	2.5
	prepared designation of experts for Ortiz plaintiffs, and Kevin's report. Filed designation, and filed report under seal per court designation, and set up link to download report.				
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/03/2014	09:12 - 10:12	[A1008] Robert W. Doggett	nc 1.0
	started gathering and reviewing expert reports of plaintiffs				
VID07 85B-IND-Electio	[CM] Case Management (org. file, etc.)	07/05/2014	09:12 - 10:12	[A1008] Robert W. Doggett	nc 1.0
	put expert reports in one spot, downloaded them, some amended from first version				
VID07 85B-IND-Electio	[T] Telephone call to...	07/14/2014	07:52 - 08:52	[A1008] Robert W. Doggett	1.0
	calls with MVD				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/14/2014	08:53 - 09:23	A1008] Robert W. Doggett	0.5
	with Plaintiffs				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	07/14/2014	09:24 - 09:54	[A1008] Robert W. Doggett	0.5
	on state's request for extension to provide expert reports.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	07/15/2014	07:53 - 08:53	[A1008] Robert W. Doggett	nc 1.0
	read and responded to more emails on extension req by state and other issues				
VID07 85B-IND-Electio	[C] Conference w/	07/15/2014	08:54 - 09:18	[A1008] Robert W. Doggett	nc 0.4
	with MR on state's motion to compel, she will work on first draft				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	07/15/2014	09:19 - 10:19	[A1008] Robert W. Doggett	nc 1.0
	more emails and filings reviewed				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	07/16/2014	07:54 - 08:00	[A1008] Robert W. Doggett	nc 0.1
	emails reviewed and filings				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/17/2014	07:55 - 08:55	[A1008] Robert W. Doggett	nc 1.0
	with plaintiffs				
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/17/2014	08:56 - 09:26	[A1008] Robert W. Doggett	0.5
	state's answer to our complaint, discussion				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	07/17/2014	09:27 - 09:51	[A1008] Robert W. Doggett	0.4
	to state on resolving motion to compel				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/17/2014	09:52 - 10:52	[A1008] Robert W. Doggett	nc 1.0
	Plaintiffs weekly call				
VID07 85B-IND-Electio	[T] Telephone call to...	07/18/2014	07:56 - 08:44	[A1008] Robert W. Doggett	0.8
	on Taylor issue (convicted of felony), but ok, he did not vote while on probation, etc.				
VID07 85B-IND-Electio	[T] Telephone call to...	07/18/2014	08:45 - 09:33	[A1008] Robert W. Doggett	0.8
	post mort on Taylor (depo suspended)				
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/18/2014	09:34 - 10:16	[A1008] Robert W. Doggett	0.7
	reviewed first draft of response to state's motion to compel				
VID07 85B-IND-Electio	[R] Research, Legal	07/21/2014	07:58 - 09:58	[A1008] Robert W. Doggett	2.0
	trying to find better cases in support of response to motion to compel				
VID07 85B-IND-Electio	[DP] Document - prepare	07/21/2014	09:59 - 11:59	[A1008] Robert W. Doggett	2.0
	editing of response to motion to compel in light of comments and cases				

ACTIVITY LOGS
FOR CASE ID VID07, PIC= ROBERT W. DOGGETT

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/24/2014	09:15 - 10:15	[A1008] Robert W. Doggett	1.0
	with plaintiffs on records and other issues				
VID07 85B-IND-Electio	[FILE] Filing	07/21/2014	11:60 - 12:30	[A1008] Robert W. Doggett	0.5
	filed response to motion to compel, exhibit need to be under seal, sent copies around				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/23/2014	08:00 - 09:00	[A1008] Robert W. Doggett	nc 1.0
	on missing records state just discovered				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	07/24/2014	08:01 - 08:13	[A1008] Robert W. Doggett	0.2
	with state on trying to resolve motion to compel				
VID07 85B-IND-Electio	[HG] Hearing	07/24/2014	08:14 - 09:14	A1008] Robert W. Doggett	1.0
	Hearing on discovery issues. Motion to compel against our clients was passed so the parties can continue to confer. Records issue discussed but no motions and no rulings.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/24/2014	09:15 - 10:15	A1008] Robert W. Doggett	1.0
	with plaintiffs on records and other issues				
VID07 85B-IND-Electio	[HG] Hearing	07/24/2014	10:16 - 11:16	[A1008] Robert W. Doggett	1.0
	Hearing on - status hearing.				
	Minute Entry for proceedings held before Judge Nelva Gonzales Ramos. STATUS CONFERENCE held on 7/24/2014. Arguments heard re: [276] United States Motion for Protective Order. Court makes rulings on the record. Written order to be entered. Parties have reach an agreement on [335] Motion for Protection. Motion terminated. Arguments heard re: [355] United States Motion for Protective Order. Court GRANTS [355] Motion. Parties continue to confer on [343] Defendants Motion to Compel. Court does not hear arguments or make a ruling at this time. Argument heard re: [395] Motion to Compel. Court GRANTS [395] Motion. Parties have reach an agreement on [420] Plaintiffs Motion to Compel. Motion terminated. Parties continue to confer on [431] Defendants Advisory. Court does not hear arguments or make a ruling at this time. Status conference set for July 31, 2014 at 10:00 a.m. Status Conference set for 7/31/2014 at 10:00 AM before Judge Nelva Gonzales Ramos Appearances:John Crawford. Natasha Korgaonkar, Kelly Dunbar, Chad W Dunn, Kembel Scott Brazil, J Gerald Hebert, Armand Derfner, Robert W Doggett, Marinda Van Dalen, John Barret Scott, Lindsey Elizabeth Wolf, John Reed Clay, Jr, Arthur D'Andrea, Ben Addison Donnell, Ezra D Rosenberg, Bradley E Heard, Anna Baldwin, Emma P Simson.(Digital # 8:59-10:19)(ERO:G. Rogan), filed.(bcortez, 2)				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/24/2014	11:17 - 11:53	[A1008] Robert W. Doggett	nc 0.6
	with plaintiffs' counsels				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	07/25/2014	08:03 - 09:03	[A1008] Robert W. Doggett	nc 1.0
	emails and filings reviewed, forwarded, discussed				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	07/25/2014	09:04 - 09:22	[A1008] Robert W. Doggett	0.3
	update sent to experts on records and expert reports				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	07/25/2014	09:23 - 09:47	[A1008] Robert W. Doggett	0.4
	on FF/CL. I want to wait to see which of our clients will testify before we do them and look at format they want.				
VID07 85B-IND-Electio	[T] Telephone call to...	07/31/2014	14:50 - 15:02	[A1008] Robert W. Doggett	0.2
	MVD on what's left to do.				
VID07 85B-IND-Electio	[EMR] E-Mail, receive/review/manage	07/31/2014	15:03 - 15:09	[A1008] Robert W. Doggett	nc 0.1
	on new data. EM to Leland and DGH.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/01/2014	10:09 - 10:27	[A1008] Robert W. Doggett	0.3
	scheduling order amendments discussed				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/01/2014	10:28 - 10:58	[A1008] Robert W. Doggett	0.5
	concerning Jewell depo				

ACTIVITY LOGS
FOR CASE ID VID07, PIC= ROBERT W. DOGGETT

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[DOC] Document - receive/review	08/02/2014	14:20 - 14:50	[A1008] Robert W. Doggett	0.5
	state's expert reports, reviewed, filed, distributed				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/02/2014	14:51 - 15:03	[A1008] Robert W. Doggett	0.2
	to KJ about depo				
VID07 85B-IND-Electio	[TF] Telephone call from	08/04/2014	07:51 - 08:15	[A1008] Robert W. Doggett	0.4
	Jose G. Went over where we are, what's left to do. Email too.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/05/2014	17:21 - 17:51	[A1008] Robert W. Doggett	nc 0.5
	and TC with MVD on plan for meeting with Ps counsel in DC. Review of emails re discovery disputes.				
VID07 85B-IND-Electio	[T] Telephone call to...	08/06/2014	16:01 - 16:25	[A1008] Robert W. Doggett	0.4
	MVD on plan for our clients for trial, which to testify				
VID07 85B-IND-Electio	[EMR] E-Mail, receive/review/manage	08/06/2014	16:26 - 16:50	[A1008] Robert W. Doggett	0.4
	case relating emails and filings reviewed				
VID07 85B-IND-Electio	[HG] Hearing	08/06/2014	16:51 - 17:51	A1008] Robert W. Doggett	nc 1.0
	Hearing, status, discovery issues - including voter fraud, information relied on by experts				
VID07 85B-IND-Electio	[DOC] Document - receive/review	08/06/2014	17:52 - 18:04	[A1008] Robert W. Doggett	0.2
	on stipulation for LUPE. We should not agree to it.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/07/2014	10:10 - 10:28	[A1008] Robert W. Doggett	0.3
	concerning expert depo schedule				
VID07 85B-IND-Electio	[DEP2] Deposition - Defend	08/15/2014	08:18 - 11:18	[A1008] Robert W. Doggett	3.0
	Jewell's depo				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/16/2014	08:16 - 09:16	[A1008] Robert W. Doggett	1.0
	on case, call with MVD				
VID07 85B-IND-Electio	[F] Facts investigation	08/16/2014	09:17 - 11:47	[A1008] Robert W. Doggett	2.5
	reviewed transcripts from LUPE depositions, first and second case, exhibits, etc.				
VID07 85B-IND-Electio	[DP] Document - prepare	08/17/2014	08:16 - 10:16	[A1008] Robert W. Doggett	2.0
	drafted FF for LUPE. Call with MVD.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	08/18/2014	08:15 - 10:45	[A1008] Robert W. Doggett	2.5
	with interest party plaintiff counsel. Went over each possible witness.				
VID07 85B-IND-Electio	[T] Telephone call to...	08/18/2014	10:46 - 11:28	[A1008] Robert W. Doggett	0.7
	with MVD to go over what we have left to do.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/19/2014	08:56 - 09:08	[A1008] Robert W. Doggett	0.2
	re designation of transcripts				
VID07 85B-IND-Electio	[TV] Travel	09/21/2014	11:19 - 14:19	[A1008] Robert W. Doggett	3.0
	to CC for closing arg prep, etc.				
VID07 85B-IND-Electio	[TP] Trial, prep	09/21/2014	14:20 - 15:50	[A1008] Robert W. Doggett	1.5
	prep for closing arg				
VID07 85B-IND-Electio	[TL] Trial	09/22/2014	11:20 - 15:20	[A1008] Robert W. Doggett	4.0
	closing arg				
VID07 85B-IND-Electio	[DOC] Document - receive/review	10/11/2014	11:06 - 16:06	[A1008] Robert W. Doggett	nc 5.0
	response to mandamus, motion for stay by state				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	12/16/2014	13:09 - 14:09	[A1008] Robert W. Doggett	nc 1.0
	on appeal plan				
VID07 85B-IND-Electio	[F] Facts investigation	02/12/2015	11:19 - 12:37	[A1008] Robert W. Doggett	nc 1.3
	research bills impacting voter id				
VID07 85B-IND-Electio	[F] Facts investigation	02/13/2015	11:19 - 12:49	[A1008] Robert W. Doggett	nc 1.5
	more research on bill filed in Texas relating to voter id, report prepared and sent out to co-counsel				

ACTIVITY LOGS
FOR CASE ID VID07, PIC= ROBERT W. DOGGETT

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	02/13/2015	12:50 - 14:02	[A1008] Robert W. Doggett	nc 1.2
	with co-counsel and DOJ, etc. on briefing issues				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	02/20/2015	12:46 - 13:46	[A1008] Robert W. Doggett	nc 1.0
	with private Ps' counsels and DOJ on contents of various BOMs				
VID07 85B-IND-Electio	[F] Facts investigation	02/22/2015	13:46 - 14:46	[A1008] Robert W. Doggett	nc 1.0
	reviewed recent filings for bills that impact case				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	02/26/2015	10:05 - 11:05	[A1008] Robert W. Doggett	nc 1.0
	on brief				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	03/23/2015	11:14 - 11:44	[A1008] Robert W. Doggett	nc 0.5
	re oral argument				
VID07 85B-IND-Electio	[T] Telephone call to...	03/23/2015	11:45 - 12:03	[A1008] Robert W. Doggett	nc 0.3
	MVD on latest in case, oral argument, travel plans.				
VID07 85B-IND-Electio	[T] Telephone call to...	07/09/2015	15:23 - 15:29	[A1008] Robert W. Doggett	nc 0.1
	client called. Called him back. Has issue with SS disability. Been denied.				
VID07 85B-IND-Electio	[EMR] E-Mail, receive/review/manage	08/21/2015	11:14 - 11:38	[A1008] Robert W. Doggett	nc 0.4
	reviewed emails on motions, and meeting				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/26/2015	14:53 - 15:11	[A1008] Robert W. Doggett	nc 0.3
	on parameters of a settlement discussion on interim relief. Wanted to suggest clarification of what an affidavit should look like if needed to vote only with a registration card.				
VID07 85B-IND-Electio	[M] Mediation	08/27/2015	14:45 - 18:45	[A1008] Robert W. Doggett	nc 4.0
	attendance at a settlement conference in Austin re temp relief				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/28/2015	14:44 - 15:08	[A1008] Robert W. Doggett	nc 0.4
	regarding consent to stay pending cert, opposed				
VID07 85B-IND-Electio	[DOC] Document - receive/review	08/29/2015	11:11 - 11:53	[A1008] Robert W. Doggett	nc 0.7
	reviewed motions, took positions in consultation				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	08/31/2015	14:44 - 15:02	[A1008] Robert W. Doggett	nc 0.3
	on case re motion for en banc consideration				
VID07 85B-IND-Electio	[DOC] Document - receive/review	09/02/2015	14:30 - 15:00	[A1008] Robert W. Doggett	nc 0.5
	review of reply on motion for remand and edits begun. Mooted out because 5th Cir ruled that motions should be carried forward until en banc rehearing request is resolved. Reviewed emails among parties regarding issue and whether a reply should be filed anyway, and when such a filing would be appropriate.				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	09/03/2015	10:39 - 11:03	[A1008] Robert W. Doggett	nc 0.4
	on reply brief on motion to enter relief pending mandate. Reviewed multiple emails on subject and suggested changes.				
VID07 85B-IND-Electio	[TF] Telephone call from....	12/21/2015	17:25 - 17:37	[A1008] Robert W. Doggett	nc 0.2
	Natasha on letter she wants to send to 5th Cir on upcoming elections				
VID07 85B-IND-Electio	[DOC] Document - receive/review	12/21/2015	17:38 - 17:44	[A1008] Robert W. Doggett	nc 0.1
	letter from private plaintiffs				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	12/21/2015	17:45 - 17:51	[A1008] Robert W. Doggett	nc 0.1
	to Natasha approving our clients to be in support of the letter to the 5th Cir				
VID07 85B-IND-Electio	[EMR] E-Mail, receive/review/manage	02/01/2016	18:59 - 19:11	[A1008] Robert W. Doggett	nc 0.2
	on whether to go to SCOTUS. I say no. Asking for thoughts from our side.				
VID07 85B-IND-Electio	[R] Research, Legal	02/05/2016	11:30 - 12:24	[A1008] Robert W. Doggett	nc 0.9
	researched all cases by SCOTUS on delay caused by circuit courts, threats of mandamus, etc.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	02/08/2016	19:14 - 20:02	[A1008] Robert W. Doggett	nc 0.8
	with MVD and JG with Chad on his thoughts about SCOTUS relief on failure of 5th to rule on anything				

ACTIVITY LOGS
FOR CASE ID VID07, PIC= ROBERT W. DOGGETT

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	02/09/2016	19:13 - 21:25	[A1008] Robert W. Doggett	nc 2.2
	with private plaintiffs on whether and how to go to SCOTUS if 5th does not rule				
VID07 85B-IND-Electio	[R] Research, Legal	02/09/2016	21:26 - 21:56	[A1008] Robert W. Doggett	nc 0.5
	cases on emergency relief in SCOTUS, and rules, and local rules in 5th on emergency motions, email private plaintiffs. Mistake to call this an emergency motion.				
VID07 85B-IND-Electio	[R] Research, Legal	02/10/2016	18:40 - 18:52	[A1008] Robert W. Doggett	nc 0.2
	recent SCOTUS case on redistricting, and delay, and activity before the primary				
VID07 85B-IND-Electio	[DOC] Document - receive/review	02/15/2016	:31 - 16:49	[A1008] Robert W. Doggett	nc 1.3
	reviewed docket in 5th in prep for UT Civil rights class. Research on amicus filed in VID to send to Gary Bledsoe.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	02/16/2016	11:27 - 13:15	[A1008] Robert W. Doggett	nc 1.8
	with our side on latest				
VID07 85B-IND-Electio	[F] Facts investigation	02/16/2016	13:16 - 14:46	[A1008] Robert W. Doggett	nc 1.5
	research lege issues, and looking at concordance				
VID07 85B-IND-Electio	[TRAI] Training - attend	02/18/2016	11:30 - 13:30	[A1008] Robert W. Doggett	nc 2.0
	law school presentation on case, presentation, travel, spoke				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	03/08/2016	12:09 - 12:33	[A1008] Robert W. Doggett	nc 0.4
	on whether to join another motion in the 5th, I am against				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	03/10/2016	12:08 - 12:20	[A1008] Robert W. Doggett	nc 0.2
	on what to do about en ban deadlines				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/21/2016	11:21 - 12:09	[A1008] Robert W. Doggett	nc 0.8
	with Ps on plan				
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/21/2016	12:10 - 12:22	[A1008] Robert W. Doggett	nc 0.2
	scheduling order				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/22/2016	11:20 - 12:32	[A1008] Robert W. Doggett	nc 1.2
	two calls -- one with state, and then one among Ps on interim relief				
VID07 85B-IND-Electio	[EMR] E-Mail, receive/review/manage	07/22/2016	12:33 - 13:03	[A1008] Robert W. Doggett	nc 0.5
	on possible interim relief				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/22/2016	13:04 - 13:34	[A1008] Robert W. Doggett	nc 0.5
	with Ps counsel again on interim relief				
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/22/2016	13:35 - 13:47	[A1008] Robert W. Doggett	nc 0.2
	offer from state - affidavit and instructions				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/22/2016	13:48 - 14:12	[A1008] Robert W. Doggett	nc 0.4
	with state on remdial order				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/22/2016	14:13 - 14:43	[A1008] Robert W. Doggett	nc 0.5
	on the motion for interim relief for HD 120 election with Ps				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/22/2016	14:44 - 16:20	[A1008] Robert W. Doggett	nc 1.6
	with court on emergency relief. Two. Then two more. I lost count.				
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/22/2016	16:21 - 16:51	[A1008] Robert W. Doggett	nc 0.5
	reviewed motion from state on interim relief and suggested changes				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/22/2016	16:52 - 17:22	[A1008] Robert W. Doggett	nc 0.5
	still another call				
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/22/2016	17:23 - 17:59	[A1008] Robert W. Doggett	nc 0.6
	review proposals				
VID07 85B-IND-Electio	[TCC] Telephone Conference Cal	07/22/2016	17:60 - 18:30	[A1008] Robert W. Doggett	nc 0.5
	another call				

ACTIVITY LOGS
FOR CASE ID VID07, PIC= ROBERT W. DOGGETT

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	07/23/2016	11:24 - 14:24	[A1008] Robert W. Doggett	nc 3.0
	numerous calls on interrim relief and emails. Judge signed first interim order.				
VID07 85B-IND-Electio	[DOC] Document - receive/review	11/28/2016	10:57 - 11:39	[A1008] Robert W. Doggett	nc 0.7
	our brief to SCOTUS, reviewed docket				
VID07 85B-IND-Electio	[TF] Telephone call from....	01/18/2017	17:52 - 18:04	[A1008] Robert W. Doggett	nc 0.2
	Dan Freeman of DOJ inquiring about Texas Legislature efforts to amend voter id				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	01/20/2017	17:53 - 18:23	[A1008] Robert W. Doggett	nc 0.5
	re continuance of intent hearing, reviewed motion filed, look up magistrate judge				
VID07 85B-IND-Electio	[HG] Hearing	01/20/2017	18:24 - 18:36	[A1008] Robert W. Doggett	nc 0.2
	TCC hearing on motion for continuance by DOJ to continue intent hearing				
VID07 85B-IND-Electio	[EMR] E-Mail, receive/review/manage	01/23/2017	17:03 - 17:21	[A1008] Robert W. Doggett	nc 0.3
	multiple emails on possible TRO or protective order on DOJ for our communications				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	02/06/2017	17:08 - 17:20	[A1008] Robert W. Doggett	nc 0.2
	reviewed numerous on plan for how to deal with possible change in position of US				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	02/22/2017	08:44 - 09:44	[A1008] Robert W. Doggett	nc 1.0
	was on call with other advocates re what to do re motion to push intent hearing, many emails				
VID07 85B-IND-Electio	[DOC] Document - receive/review	02/22/2017	09:45 - 09:57	[A1008] Robert W. Doggett	nc 0.2
	reviewed draft of response to motion to push intent hearing				
VID07 85B-IND-Electio	[DOC] Document - receive/review	02/24/2017	10:34 - 10:40	[A1008] Robert W. Doggett	nc 0.1
	order from court denying continuance of intent hearing				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	02/24/2017	10:41 - 10:47	[A1008] Robert W. Doggett	nc 0.1
	emails on time needed for hearing				
VID07 85B-IND-Electio	[DOC] Document - receive/review	02/24/2017	10:48 - 10:54	[A1008] Robert W. Doggett	nc 0.1
	discovery responses from D re City's discovery				
VID07 85B-IND-Electio	[DOC] Document - receive/review	03/20/2017	11:16 - 11:34	[A1008] Robert W. Doggett	nc 0.3
	reviewed draft of reply on jurisdiction of court in light of SB 5				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	04/11/2017	11:56 - 12:50	[A1008] Robert W. Doggett	nc 0.9
	Jose, DGH, Marinda. Disucssion of Judge Ramos 2nd opinion holding SB14 was enacted for a discriminatory purpose.				
VID07 85B-IND-Electio	[R] Research, Legal	04/12/2017	09:55 - 11:25	[A1008] Robert W. Doggett	nc 1.5
	on the past orders and opinions and impact on 3c relief				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	04/13/2017	09:54 - 10:42	[A1008] Robert W. Doggett	nc 0.8
	on intent order from Ramos, and where we go from here				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	04/18/2017	15:19 - 15:31	[A1008] Robert W. Doggett	nc 0.2
	on scheduling to meet cls				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	04/24/2017	16:38 - 16:56	[A1008] Robert W. Doggett	nc 0.3
	MVD and JG on plan for meeting with cls.				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/12/2017	12:07 - 13:19	[A1008] Robert W. Doggett	nc 1.2
	discussed remedies with other attys				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/15/2017	14:19 - 15:01	[A1008] Robert W. Doggett	nc 0.7
	LUPE, JG and MVD to discuss where case is now				
VID07 85B-IND-Electio	[R] Research, Legal	05/27/2017	07:21 - 07:51	[A1008] Robert W. Doggett	nc 0.5
	watching Texas Lege for CCR on SB 5				
VID07 85B-IND-Electio	[R] Research, Legal	05/27/2017	07:52 - 08:22	[A1008] Robert W. Doggett	nc 0.5
	watching conference committee, looking for report to distribute				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	05/30/2017	16:41 - 16:53	[A1008] Robert W. Doggett	nc 0.2
	with all parties on scheduling				

ACTIVITY LOGS
FOR CASE ID VID07, PIC= ROBERT W. DOGGETT

File/ID/Type	Code	Date	Time	Staff	Hours
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	06/07/2017	14:41 - 15:41	[A1008] Robert W. Doggett	nc 1.0
	status conference with court and parties				
VID07 85B-IND-Electio	[DOC] Document - receive/review	06/12/2017	15:02 - 15:32	[A1008] Robert W. Doggett	nc 0.5
	reviewed for edits brief from P's on scheduling				
VID07 85B-IND-Electio	[EM] Email, Draft / Send	06/21/2017	17:40 - 17:46	[A1008] Robert W. Doggett	nc 0.1
	on scheduling next con on remedies briefing				
VID07 85B-IND-Electio	[DOC] Document - receive/review	06/26/2017	07:31 - 07:43	[A1008] Robert W. Doggett	nc 0.2
	reviewed email to send to opp, sent comments				
VID07 85B-IND-Electio	[DOC] Document - receive/review	06/28/2017	17:26 - 17:44	[A1008] Robert W. Doggett	nc 0.3
	motion re education materials, reviewed				
VID07 85B-IND-Electio	[DOC] Document - receive/review	07/24/2017	18:37 - 18:43	[A1008] Robert W. Doggett	nc 0.1
	advisory filed by US, responding to previous advisories				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	08/28/2017	09:25 - 10:07	[A1008] Robert W. Doggett	nc 0.7
	with advocates on 3(c) relief				
VID07 85B-IND-Electio	[TCC] Telephone Conference Call	09/25/2017	06:53 - 07:35	[A1008] Robert W. Doggett	nc 0.7
	with advocates on issues on appeal				
VID07 85B-IND-Electio	[DOC] Document - receive/review	10/31/2017	16:45 - 17:03	[A1008] Robert W. Doggett	nc 0.3
	reviewed recent filings				

VID07 TOTAL: 300.9

After Billing Judgment Discount: 149.0

REPORT TOTAL:	149.0
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149.0 hrs. @ \$613.00 = \$91,337.00